

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

PAUL EICHEL)

Case No. 3:12-00220

Judge Haynes

MOTION TO CONTINUE TRIAL DATE

COMES NOW the Defendant, Paul Eichel, by and through his undersigned counsel, and respectfully requests that this Honorable Court enter an order continuing the trial of the above-captioned case from Tuesday, February 12, 2013 at 9:00 a.m. to a later date convenient to the Court and counsel. In support hereof, Defendant states as follows:

1. The trial of this case is currently scheduled for Tuesday, February 12, 2013 at 9:00 a.m. (Docket Entry 13). This is the first setting for trial. Mr. Eichel is on bond.

2. Consistent with this Court's Order setting the case for trial, undersigned counsel has contemporaneously filed a supporting affidavit stating the reasons for the continuance. (Docket Entry 16). The Order also requires counsel to suggest "proposed alternative trial dates and other pretrial deadlines." *Id.* Given counsel's current trial schedule, he realistically would not be available to try the case until September 2013. A reasonable pretrial motion deadline would be on or before the close of business on Friday, May 3, 2013.

3. Assistant United States Attorney Brent A. Hannafan has authorized undersigned counsel to report that the government does not object to the Defendant's request to continue the 2/12/13 trial date.

4. Defendant Eichel will supplement this filing with an appropriate, executed Waiver

Docket
The new hearing
on the
indemnity of
insurance to allow
defense counsel
to be prepared
for trial.
Counsel
for the
prosecution
should file
an
Agreed
Order
with
dates
for trial,
trial
hearing
and
plea
deadline
with
20 days
of this
Order.
Call of
08/12/13
1-23-13